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US DISTRICT COURT
DISTRICT OF ALASKA

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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ALASKA

<p>SAMSON TUG AND BARGE CO., INC., an Alaska Corporation</p> <p>Plaintiff/Appellant</p> <p>v.</p> <p>UNITED STATES OF AMERICA,</p> <p>acting by and through the UNITED STATES DEPARTMENT of the NAVY MILITARY SEALIFT COMMAND, and UNITED STATES DEPARTMENT OF THE ARMY MILITARY TRAFFIC MANAGEMENT COMMAND</p>	<p>) Civil No. A03-006 CV (JWS)</p> <p>)</p> <p>) IN ADMIRALTY</p> <p>)</p> <p>) JOINT STIPULATION TO EXTEND</p> <p>) PRETRIAL DEADLINES, AND</p> <p>) (PROPOSED) ORDER THEREON</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>
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JOINT STIPULATION TO EXTEND PRETRIAL DEADLINES,
AND (~~PROPOSED~~) ORDER THEREON

1 The parties hereto, through the undersigned consents of their attorneys of record, do
2 hereby agree and request that the pretrial deadlines presently set in this matter be continued
3 by six months.

4 Plaintiff Samson Tug and Barge Co., Inc. ("Samson") alleges defendant United States
5 breached a contract for the carriage of cargo to and from the former Naval air station at
6 Adak, Alaska, a facility now long closed. Consequently, witnesses and documents have been
7 disbursed, making the investigation and discovery of this matter difficult for both parties.
8 A large number of documents have been located and exchanged to date. Depositions are
9 scheduled of certain Government witnesses in late November of 2005, and of certain Samson
10 witnesses beginning in December of 2005. It now appears that some witnesses who are no
11 longer employees of the parties, or who are no longer active duty service members, may need
12 to be subpoenaed in various locations around the country. The parties continue to work co-
13 operatively to advance this case, and narrow the issues for trial.

14 Counsel have conferred and agree that one further six-month extension in discovery
15 is necessary, and requests the Court's approval of the deadlines they jointly believe will
16 result in either some alternative resolution between the parties, or the proper presentation
17 of the case at trial.

18 The parties, therefore, agree and request that the following dates be approved:

- 19 1. The close of discovery, presently scheduled for December 16, 2005, shall be
20 extended to June 16, 2006;
- 21 2. The deadline for witness disclosure, which ran on October 7, 2005, shall be
22 extended to April 14, 2006;
- 23 3. Plaintiff Samson's disclosure of its experts shall occur by March 17, 2006,
24 and defendant United State's disclosure of its experts shall occur by April 14,
25

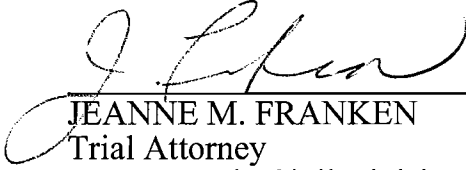
2006, the general witness disclosure deadline; and

4. The date for filing dispositive motions, presently set for January 13, 2006, shall be extended to July 14, 2006.

IT IS SO AGREED AND REQUESTED:

Dated: 11/16/05

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United States of America

Dated: 11/18/05

Lay Office of William G. Royce


WILLIAM G. ROYCE

Attorney for Plaintiff
Samson Tug and Barge Company, Inc.

(PROPOSED) ORDER

This matter having coming before the Court on joint stipulation of the parties seeking to amend and extend the dates for completing discovery, making disclosures, and filing dispositive motions,

IT IS, THEREFORE, HEREBY ORDERED, as follows:

1. Discovery shall close on ~~December~~ ^{June} 16, 2006;
2. Plaintiff shall disclose its expert witnesses by March 17, 2006;
3. All other witness disclosures shall be exchanged by April 14, 2006, including defendant's disclosure of its expert witnesses; and
4. Dispositive motions shall be filed by July 14, 2006.

IT IS SO ORDERED this 30th day of Nov., 2005 at Anchorage, Alaska



CHIEF JUDGE JOHN SEDWICK
United States District Court for the
District of Alaska

A03-0006--CV (JWS)

12-2-05

W. ROYCE
J. FRANKEN

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UNITED STATES DISTRICT COURT
DISTRICT OF ALASKA

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